

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

CWA PLAZA I and II APARTMENTS,)

Plaintiff,)

v.)

NO.: _____

PACIFIC INSURANCE COMPANY,)

LIMITED,)

Defendant.)

NOTICE OF REMOVAL

Comes now Defendant, Pacific Insurance Company, by and through counsel, and gives notice of its removal of this case to this Court, in support of which it asserts the following:

1. On March 15, 2011, Plaintiff filed a Complaint in the Chancery Court for Davidson County, Tennessee, Docket No. 11-358-III, against the above-named Defendant.

2. Copies of the Summons and Complaint, which were served upon Defendant on March 30, 2011, are attached hereto as Exhibit 1. These documents are all the processes, pleadings, and Orders which have been served upon Defendant.

3. Plaintiff was at the time of the commencement of said action and still is a citizen and resident of the State of Tennessee and of no other state.

4. Defendant was at the time of the commencement of said action and still is a corporation organized under the laws of the State of Connecticut and no other state, with its principal place of business in Connecticut.

5. Plaintiffs specify the amount in controversy in the Complaint to be \$126,223.66.

6. Since the amount in controversy exceeds the sum or value of \$75,000.00 and is between citizens of different states, this Court has original jurisdiction over this action pursuant to the provisions of 28 U.S.C. § 1332.

7. Pursuant to 28 U.S.C. § 1441, this cause of action may be removed from the Chancery Court of Davidson County, Tennessee to the U.S. District Court for the Middle District of Tennessee, Nashville.

WHEREFORE, Defendant prays this Court accept this Notice and to proceed with the action heretofore referred to in accordance with law.

Respectfully submitted,

**LEITNER, WILLIAMS,
DOOLEY & NAPOLITAN, PLLC**

By: s/ Frank Thomas
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CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel of record for the parties at interest in this cause by electronic notification through the Court's CM/ECF System:

T. Turner Snodgrass, Esq.
BPRN 7318
404 James Robertson Parkway
Suite 2100
Nashville, TN 37219

this the 22nd day of April, 2011.

s/ Frank Thomas
Frank Thomas